

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTINE CONFORTI,

Plaintiff,

v.

CHRISTINE GIORDANO HANLON, in her official capacity as Monmouth County Clerk, SCOTT M. COLABELLA, in his official capacity as Ocean County Clerk, and PAULA SOLLAMI COVELLO, in her official capacity as Mercer County Clerk,

Defendants.

CIVIL ACTION NO.: 3:20-cv-08267

**APPLICATION FOR EXTENSION OF
TIME TO ANSWER, MOVE, OR
OTHERWISE REPLY [LOCAL CIVIL
RULE 6.1 (B)]**

Application is hereby made for a Clerk's Order extending the time within which Defendant Paula Sollami Covello in her official capacity as Mercer County Clerk ("Covello"), may answer, move or otherwise reply to the Complaint and Jury Demand filed by plaintiff, Christine Conforti ("Plaintiff"), herein. In support of this application, it is represented that,

1. No previous extension has been obtained;
2. Plaintiff's Complaint was filed on July 6, 2020;
3. On September 14, 2020, Plaintiff requested that Covello waive service which counsel agreed to do on her behalf under Fed. R. Civ. Proc. 4(d);
4. Defendants' time to answer, move or otherwise reply therefore expires on October 19, 2020 under Fed. R. Civ. Proc. 12(a)(1)(A)(ii); and
5. This application is made prior to the expiration of the period sought to be extended.

It is respectfully requested that the time within which Defendant may answer, move or otherwise reply to the Complaint be extended by a period of fourteen (14) days through November 2, 2020.

Respectfully submitted,

/s/ Jennifer Borek

Jennifer Borek, Esq.

Angelo J. Genova, Esq.

Christopher Zamlout, Esq.

GENOVA BURNS LLC

494 Broad Street

Newark, New Jersey 07102

Attorneys for Defendant,

Paula Sollami Covello

Dated: October 15, 2020

ORDER

The above application is GRANTED, and Defendant's time to answer, move or otherwise reply is extended to November 2, 2020.

ORDER DATED: _____, 2020

By: _____

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